

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:CR-18-0097
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	(Electronically filed)

MOTION TO WITHDRAW AS COURT-APPOINTED COUNSEL

AND NOW comes the undersigned, Gino A. Bartolai, Esquire, court-appointed counsel for the Defendant, Ross Roggio, and files the following Motion to withdraw as counsel for Roggio, and in support thereof avers the following:

1. On March 20, 2018, Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of Title 18, United States Code, Section 371; violations of the Arms Export Control Act, Title 22, United States Code, Sections 2778(b) and (c); and the International Emergency Powers Act, Title 50, United States Code, Sections 1702 and 1705(c); smuggling goods from the United States, in violation of Title 18 United States Code Sections 554 and 2; wire fraud, in violation of Title 18, United States Code Section 1342; and money laundering, in violation of Title 18 United States Code, Sections 1956(a)(2)(A) and 2.

2. On March 23, 2018, Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment and entered a plea of not guilty to the charges.

3. On April 3, 2019, the undersigned was appointed as counsel for Roggio pursuant to the Criminal Justice Act, 18 U.S.C Section 3006A.

4. Trial in this matter is scheduled for February 6, 2023.

5. On August 9th and 10th, 2022, Attorneys Curt M. Parkins, Matthew T. Comerford, and Jason A Shrive entered their appearances as private counsel for Roggio. (**Doc 151-153**).

WHEREFORE, the undersigned counsel respectfully requests that this Honorable Court issue an Order withdrawing him as counsel for Defendant Ross Roggio.

Respectfully submitted,

Date: August 16, 2022

s/Gino Bartolai
Gino Bartolai, Esquire
Attorney ID# PA 56642

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Pittston, Pennsylvania 18640
(570) 654-3572
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Attorney for Ross Roggio

CERTIFICATE OF CONCURRENCE-NONCONCURRENCE

I, Gino Bartolai, Esquire, certify that on this date I contacted Todd K. Hinkley, Assistant United States Attorney, who advised that he takes no position in the within **Motion to Withdraw as Counsel**.

Date: August 16, 2022

s/Gino Bartolai
Gino Bartolai, Esquire

CERTIFICATE OF SERVICE

I, Gino Bartolai, Esquire, do hereby certify that I electronically served, via e-mail, a copy of the foregoing **Motion to Withdraw as Counsel**, to the following

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Ross Roggio

Date: August 16, 2022

s/Gino Bartolai
Gino A. Bartolai, Esquire